

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 1:21-cr-10256-RWZ
)	
KINGSLEY R. CHIN,)	
ADITYA HUMAD, and)	
SPINEFRONTIER, INC.,)	
)	
Defendants)	

MOTION FOR REDACTION OF ELECTRONIC TRANSCRIPT

The United States respectfully requests the redaction of the identities of grand jury witnesses from the transcript of the March 28, 2024 hearing in this matter.

The government moved to seal references to grand jury witnesses in its brief filed in opposition to the defendants' motions to dismiss. Dkt. No. 156. The Court granted the motion *nunc pro tunc*, stating that the sealing was "appropriate here as Local Rule 106.1 provides that filings 'concerning or contesting grand jury proceedings shall be sealed and impounded unless otherwise ordered by the court based upon a showing of particularized need.'" Dkt. No. 162. During oral argument held on March 28, 2024, multiple grand jury witnesses were identified by name by counsel for the defense. The Government noted its objection, and the Court admonished defense counsel. To protect the privacy and identity of these individuals, the Government requests the minimal redactions indicated in the version of the transcript submitted to the Court clerk contemporaneously with this filing.

The Government requested the defendants' position on this motion. As of the time of this filing, counsel for the defendants had not provided a position.

Dated: May 21, 2024

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

JOSHUA S. LEVY

Acting United States Attorney

/s/ Christopher Looney

ABRAHAM R. GEORGE

PATRICK CALLAHAN

CHRISTOPHER LOONEY

Assistant U.S. Attorneys

1 Courthouse Way

John Joseph Moakley U.S. Courthouse

Boston, MA 02210

(617) 748-3100